



**Privacy Impact Assessment
for the**

Student Aid on the Web

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Contact Point

System Owner: Jennifer Douglas

Author: Adam Essex

Federal Student Aid (FSA)

U.S. Department of Education



1. What information will be collected for the system?

Student Aid on the Web (hereafter the 'Web site') collects information from visitors appropriate to the college search, application, and financial aid processes. This information is collected only if the visitors wish to register within MyFSA and use the functionality that permits users to perform and store customized searches and calculations based on information and criteria they provide, and to pre-populate college and loan applications. Depending on the function performed, different information is required.

To register with MyFSA and create a personal account, the following information is collected: First Name, Last Name, DOB, E-mail, Username, Password, Question, Answer, and Current Grade Level.

To perform customized searches and personalized calculations, information such as the following is collected but not saved: preferences regarding type (four-year, private), location (state), size (# of students, students/faculty), and cost (in-state, out-of-state tuition) of colleges; key values from the federal tax return for financial aid; and keyword searches for scholarships.

To store customized searches and personalized calculations, the following information is collected: None. The user bookmarks the search.

To pre-populate applications, the following information is collected: MyFSA registration information. In addition, for the college application, the user provides specific admissions information, such as high school information and activities, standardized test data, employment/work history, and information regarding parents/spouses/siblings. For a detailed listing of data elements, [click here](#). In order to pre-populate the FAFSA, the following information is used: Last Name, First Name, Middle Initial, Permanent Address, State of Legal Residence, SSN, DOB, Permanent Home Phone Number, Driver's License Number, Driver's License State, and Citizenship.

In addition, the following demographic information will be captured and analyzed in order to permit FSA to target college and aid information to particular audiences: Zip Code and Education Level.

If a user decides to send FSA an electronic mail message (e-mail), the message will usually contain the return e-mail address. If the user includes personally identifying information in the e-mail because he/she wants FSA to



address issues specific to his/her situation, FSA may use that information in responding to the request. Information submitted by e-mail will not be contained in a privacy act system of record.

Information collected through the *Student Aid on the Web* Feedback Survey Form is used to analyze overall satisfaction with *Student Aid on the Web* and its various features, assess the Web site's success, and determine how to enhance the service(s). Information submitted through the survey will not be contained in a privacy act system of record.

Using MyFSA is entirely voluntarily and therefore any information collected is provided voluntarily by users. Although one need not provide an SSN to use MyFSA, the SSN is a mandatory field in completing the FAFSA [Sections 483 (20 U.S.C § 1090) and 484 (20 U.S.C. § 1091) of the Higher Education Act (HEA) of 1965, as amended]. Therefore, registrants with MyFSA will be given the option to add the SSN to their profiles at any time for purposes of pre-populating the FAFSA.

FSA will not permit children under the age of 13 to create accounts. Users must be 13 years of age or older to register with MyFSA.

No cookies or other tracking technology are used on the web site. If a user does nothing during the visit but browse through the website, read pages, or download information, our website's operating system will automatically record some general information about the visit.

During the visit, our web operating system will record:

- The Internet domain for user's Internet service, such as "xcompany.com" or "xcompany.net" if the user has a private Internet access account, or "yourschool.edu" if the user connects from a college or university domain.
- The type of browser (such as "Netscape version x" or "Internet Explorer version x") being used.
- The type of operating system used (such as Macintosh, Unix, or Windows).
- The date and time of the visit to our site, and the web pages visited on our site.
- The address of the previous website the user was visiting, if the user linked to us from another website.

We use this non-personal information for statistical analysis, to help us make our site more useful to visitors. This tracking system does not record information about individuals.



2. Why is this information being collected?

Use of MyFSA facilitates the college search, application and loan processes. The information collected is needed in order to provide the student/borrower/parent personalized information regarding college savings, college applications, and financial aid applications. Based on user-provided information and criteria, "MyFSA" tools perform school searches, scholarship/grant searches, college savings calculations, cost of attendance calculations and other queries.

If personally identifying information is included in an e-mail, it is because the customer is requesting we address issues specific to his/her situation. Information collected through the Survey Form helps us determine the effectiveness of *Student Aid on the Web* as a customer service tool and its potential role in improving the delivery of FSA information and services. The Survey Form collects no privacy information.

3. How will FSA use this information?

The information is used by the Department and its Contractor to perform the following services:

- Provide information targeted to the user, based on requirements and criteria provided by the user (information about schools, loans, applications, etc).
- Store search results for later retrieval.
- Pre-populate the electronic Free Application for Federal Student Aid (FAFSA).
- Pre-populate college applications.
- Assist FSA to target financial aid and college information to target audiences, based on the demographics provided by site users.

Demographic data will not be linked to personal information to identify individuals. The demographic data will be used to determine the populations of Web site users that would benefit from specific programs, opportunities, and updates. The Department has not yet defined specific marketing plans but may request assistance from a qualified contractor(s) to execute specific aspects of the plan. Marketing will not involve the disclosure of any personal identifiable information. Additionally, there is no use of cookies or other tracking technology on the Web site.



- Respond to requests received through e-mail.
- Analyze overall satisfaction with *Student Aid on the Web* and its various features, assess the Web site's success, and determine how to enhance the service(s).

4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities?

The Department of Education may disclose information contained in a record in an individual's account under the routine uses listed in the Privacy Act System of Records notice without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Specific disclosures include the following:

- Freedom of Information Act (FOIA) Advice Disclosure
- Disclosure to the DOJ
- Contract Disclosure
- Litigation and Alternative Dispute Resolution (ADR) Disclosures
- Research Disclosure
- Congressional Member Disclosure
- Disclosure for Use By Law Enforcement Agencies
- Enforcement Disclosure
- Employment, Benefit, and Contracting Disclosure
- Employee Grievance, Complaint or Conduct Disclosure
- Labor Organization Disclosure
- Disclosure to Providers of Web-based Postsecondary Education

Admission Applications

These disclosures may be made on a case-by-case basis. If the Department has complied with the computer matching requirements of the Privacy Act, disclosure also may be made to another agency under a computer matching agreement.

There will be no sharing of information for purposes outside of the above disclosure requirements or for anything other than the primary purpose(s) of collecting the information. Any contractor responsible for the operations of this Web site, including XAP, is held to the privacy and security requirements of the Department of Education in the handling of information collected through the Web site



5. Describe the notice or opportunities for consent that would be or are provided to individuals about what information is collected and how that information is shared with other organizations.

As the Web site is a government agency website that the public accesses, the Privacy Policy is appropriately posted for Web site users. This is a general policy, which applies to the handling of any information collected at the site. The policy highlights the voluntary nature of information collected, and explains which data elements are necessary for each level of functionality. Customers are notified that providing the information constitutes consent to all of its uses and they are given no option to affirmatively consent to certain uses. In addition, the policy notifies customers about the automatic recording and potential uses of any non-personal information about a visit (i.e., site management data).

A Privacy Act Statement is incorporated into the FSA web Privacy Policy articulating the specific authority for collecting personal information that will be maintained and retrieved by name or identifier from a Privacy Act system of records, the mandatory or voluntary nature of the information collected and the uses of the information. A link to the [Privacy Act Statement](#) is provided on each page of the Web site. Users are specifically notified that providing the SSN is mandatory to complete the FAFSA and are provided the statutory authority requiring the SSN for this purpose. However, users are given the option to voluntarily provide and store SSN information in their account profiles in anticipation of completing the FAFSA.

6. How will the information be secured?

The completion of system security plans is a requirement of the Office of Management and Budget (OMB) Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law 100-235, "Computer Security Act of 1987." The Web site has completed a system security plan demonstrating its compliance with the IT requirements mandated by federal law and policy. The security plan contains details regarding the Risk Assessment conducted for the Web site, as well as the security controls (hardware/software/facilities/personnel) in place to mitigate any identified risks to the information collected on the Web site. Management, operational, and technical security controls are in place for the Web site, encompassing personnel, physical environment access, contingency plans, disaster recovery, and identification and authentication procedures. The Web site is currently in the operations/maintenance phase of the life cycle. As such, the following functions are being performed: security operations and administration, operational assurance, audits and monitoring. The System



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Security Officer (SSO) for the Web site is Adam Essex (Program Manager)
(202) 377-3515.

7. Is a system of records being created or updated with the collection of this information?

Yes, a system of records has been created with this collection of information. Users are provided notice of rights under the Privacy Act via links to the agency Privacy Act regulations (5 C.F.R. Part 5b.) and to the Privacy Act system of records notice for the Web site (formerly, the Students Portal) (68 Fed. Reg. 23113 (April 30, 2003)).

8. List the web addresses (known or planned) that will have a Privacy Policy.

<http://studentaid.ed.gov>